IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001

03-MD-1570 (GBD)(FM) ECF Case

This document relates to:

Ashton, et al. v. Al Qaeda Islamic Army, et al. No. 02-CV-6977

Burnett, et al. v. Al Baraka Investment & Development Corp., et al., No. 03-CV (3.84)

Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al., No. 04-CV-05970

Federal Insurance Col, et al. v. Al Qaida, et al., No. 03-CV-6978

Euro Brokers v. Al Baraka Investment and Development Corp., et al, No. 04-CV-7279 Estate of O'Neill, et al. v. Al Baraka Investment and Development Corp., et al, No. 04-CV-1923

World Trade Center Properties, LLC, et al. v. Al Baraka Investment and Development

Corp., et al., No. 04-CV-07280

STATE OF NEW YORK)	
)	SS
COUNTY OF NEW YORK)	

MOTION TO ADMIT COUNSEL PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Omar T. Mohammedi, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Frederick J. Goetz Goetz & Eckland P.A. 43 Main Street S.E. Suite 505 Minneapolis, MN 55414 Phone No. (612) 874-1552 Fax No. (612) 331-2473

Frederick J. Goetz is a member in good standing of the Bar of the State of Minnesota. There are no pending disciplinary proceedings against Frederick J. Goetz in any State or Federal court.

Dated: March 21, 2011

Respectfully submitted,

Omar T. Mohammedi, Esq. (OM7234) Law Firm of Omar T. Mohammedi, LLC

233 Broadway, Suite 801

Woolworth Building

New York, NY 10279

Phone No. (212) 725-3846

Fax No. (212) 202-7621

Attorneys for World Assembly of Muslim Youth Saudi Arabia and World Assembly of

Muslim Youth International

CERTIFICATE OF GOOD STANDING

STATE OF MINNESOTA IN SUPREME COURT

Certificate of Good Standing

This is to certify that the following lawyer is in good standing.

FREDERICK JAMES GOETZ

was duly admitted to practice as a lawyer and counselor at law in all the courts of this state on

October 16, 1987

Given under my hand and seal of this court on

March 10, 2011

Frederick K. Grittmer

Frederick K. Grittner Clerk of Appellate Courts

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AFFIDAVIT OF OMAR T. MOHAMMEDI IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

Omar T. Mohammedi, being first duly sworn and upon oath, hereby deposes and states as follows:

- 1. I am a lawyer with the law firm of Omar T. Mohammedi, LLC, counsel for World Assembly of Muslim Youth Saudi Arabia and World Assembly of Muslim Youth International in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of said defendants' motion to admit Frederick J. Goetz as counsel pro hac vice to join in representing said defendants' in this matter.
- 2. I am a member in good standing of the bar of the state of New York, and was admitted to practice law in 1997. I am also admitted to the bar of the United

District Court for the Southern District of New York, and am in good standing with this Court.

- 3. I have known Frederick J. Goetz since 2008.
- 4. Mr. Goetz is a partner with the firm Goetz and Eckland P.A. in Minneapolis, MN.
- 5. I have found Mr. Goetz to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure. He is a member in good standing of the bar of the state of Minnesota and was admitted to practice in October of 1987. He is also a member of the bar of the United States Supreme Court, the Eighth Circuit Court of Appeals, the United States District Court for the District of Minnesota, and the United States District Court for the District Court for the Southern District of Illinois, United States District Court for the Southern District of Iowa, United States District Court for the District of Kansas, and the United States District Court for the District of Kansas.
- 6. Accordingly, I am pleased to move the admission of Frederick J. Goetz, pro hac vice.
- 7. I respectfully submit a proposed order granting the admission of Frederick J. Goetz, pro hac vice, which is attached hereto as Exhibit A.

WHEREAS it is respectfully requested that the motion to admit Frederick J. Goetz, pro hac vice, to represent the above-named defendants in the above-captioned matter, be granted.

Dated: March 21, 2011

Respectfully submitted,

Omar T. Mohammedi, Esq. (OM7234)

Law Firm of Omar T. Mohammedi, LLC

233 Broadway, Suite 801

Woolworth Building

New York, NY 10279

Attorneys for World Assembly of Muslim Youth Saudi Arabia and World Assembly of

Muslim Youth International

Sworn to before me this 2 day of

March, 2011.

Notary Public

NOTARY PUBLIC, State of New York

NOTARY PUBLIC, State of New York

No. 02ME5047448

Qualified in Kings County

Commission Expires August 7, 19

EXHIBIT A

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STATE OF NEW YORK

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ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION

Upon the Motion of Omar T. Mohammedi attorney for World Assembly of Muslim Youth Saudi Arabia and World Assembly of Muslim Youth International and said attorney's affidavit in support;

IT IS HEREBY ORDERED THAT

Frederick J. Goetz Goetz & Eckland P.A. 43 Main Street S.E., Suite 505 Minneapolis, MN 55414 612-874-1552 612-331-2473 (Fax) fgoetz@goetzeckland.com

is admitted to practice pro hac vice as co-counsel for World Assembly of Muslim Youth Saudi Arabia and World Assembly of Muslim Youth International in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing for this Court are subject to the local rules of this Court including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (EFC) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:	
	United States District/Magistrate Judge

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CERTIFICATE OF SERVICE

I, Heela Masood, hereby certify that I have this 21st day of March, 2011 caused to be served a true and correct copy of the foregoing documents upon all parties who are filing users in the above-captioned actions by sending the documents by electronic means, pursuant to Case Management Order No. 2 and procedure 9 of the Court's procedures for documents that are not filed through the ECF filing system.

Heela Masood